UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

WESTCHESTER PUTNAM COUNTIES HEAVY & HIGHWAY LABORERS LOCAL 60 BENEFIT FUNDS, Individually and on Behalf of All Others Similarly Situated,) Case No.: 1:16-cv-02400 (AT)(SN))
Plaintiff,))
v.))
BRIXMOR PROPERTY GROUP INC., MICHAEL CARROLL, MICHAEL PAPPAGALLO, AND STEVEN SPLAIN,))))
Defendants.	ý)

NOTICE OF LEAD PLAINTIFFS' UNOPPOSED MOTION FOR (I) PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT, (II) CERTIFICATION OF THE SETTLEMENT CLASS, AND (III) APPROVAL OF NOTICE TO THE SETTLEMENT CLASS

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to the Court's May 30, 2017 Order (ECF No. 71), and upon the accompanying Lead Plaintiffs' Memorandum of Law in Support of Unopposed Motion for (I) Preliminary Approval of Class Action Settlement, (II) Certification of the Settlement Class, and (III) Approval of Notice to the Settlement Class, and the Stipulation and Agreement of Settlement (the "Stipulation") filed simultaneously herewith, and all prior proceedings in this Action, through their undersigned counsel, Lead Plaintiffs Westchester Putnam Counties Heavy & Highway Laborers Local 60 Benefit Funds, Teamsters Local 456 Annuity Fund, and the City of Birmingham Retirement and Relief System (collectively, "Lead Plaintiffs"), on behalf of themselves and the proposed Settlement Class, pursuant to Rule 23 of the Federal Rules of Civil Procedure, now move this Court before the Honorable Analisa Torres

at the United States District Court, Southern District of New York, 500 Pearl Street, New York,

New York 10007, at a time and date to be determined by the Court, for entry of the Parties'

agreed-upon Proposed Order Preliminarily Approving Settlement and Providing for Notice (the

"Preliminary Approval Order"), attached hereto as Exhibit A. If entered, the Preliminary

Approval Order will, among other things:

Preliminarily approve the proposed class action settlement for \$28,000,000.00, subject to (1) notice to the Settlement Class and later consideration of final approval to resolve this

Action in its entirety;

(2) Approve the form, content and manner of the class notices being given to members of the

Settlement Class;

Certify the Settlement Class for purpose of the Settlement; and (3)

(4) Schedule a hearing, and certain deadlines related thereto, on final approval of the

Settlement, proposed Plan of Allocation, and Lead Counsel's application for an award of

Attorneys' Fees and reimbursement of Litigation Expenses.

Defendants have informed Lead Plaintiffs that they consent to this motion. Lead

Plaintiffs respectfully suggest that this motion may be granted without a hearing such that notice

of the proposed Settlement may be promptly sent to the members of the Settlement Class, and

that a hearing be scheduled for consideration of final approval of the proposed Settlement.

Dated: July 28, 2017

New York, New York

Respectfully submitted,

/s/ Steven B. Singer

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